



NORLITE CORPORATION

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April 11, 2013

Ms. Nancy Baker
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 03/07/13- 04/09/13
Kiln 2: 03/07/13- 04/09/13

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 03/07/13 thru 04/09/13. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the LGF flow monitor. Several of the cutoffs were attributable to the end of the burn tank being reached which caused the LGF pump to surge. Other cutoffs were attributable to controlling LGF flow with valve while having a high LGF Line pressure. Norlite has been working with the Department to improve overall delivery and fuel handling processes at the kilns and is hopeful to have a final resolution in place sometime this year. Norlite will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.



NORLITE CORPORATION

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joeseeph Hadersbeck, NYSDEC – R4w/attachments
Jim Quinn, NYSDEC – R4 w/attachments
Tita LaGrimas – Tradebe



NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 1
03/07/13 - 04/09/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/7/2013	10:31:25	3/7/2013	10:39:26	0:08:01	65	Malfunction	The End of the Burn Tank Was Reached Which Caused a Surge in the LGF Flow, Triggering the Upper Instantaneous Setpoint to be Reached for LGF Flow Span	LGF Flow	Span	Switched Tanks and Reestablished Fuel Flow
3/7/2013	10:39:55	3/7/2013	10:40:21	0:00:26	66	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span Due to LGF Pump Pressure Surging	LGF Flow	Span	Switched Burn Tanks
3/11/2013	6:31:52	3/11/2013	6:32:28	0:00:36	67	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the pH Sampling Loop Being Partially Plugged With Soda Ash Solids	Scrubber pH	Span	The Sample Loop Was Cleared and the pH Probe Recalibrated
3/11/2013	6:36:24	3/11/2013	6:37:07	0:00:43	68	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span Due to the pH Sampling Loop Being Partially Plugged With Soda Ash Solids	Scrubber pH	Span	The Sample Loop Was Cleared and the pH Probe Recalibrated
3/18/2013	5:12:54	3/18/2013	5:13:27	0:00:33	69	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/20/2013	4:19:36	3/20/2013	4:20:17	0:00:41	70	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
3/21/2013	9:13:26	3/21/2013	9:13:50	0:00:24	71	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber pH Span	Scrubber pH	Span	Adjusted Fuel Flow
3/22/2013	5:14:45	3/22/2013	5:15:17	0:00:32	72	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
3/22/2013	14:39:52	3/22/2013	14:42:09	0:02:17	73	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
3/30/2013	23:53:59	3/30/2013	23:55:16	0:01:17	74	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
4/2/2013	18:12:37	4/2/2013	18:29:15	0:16:38	75	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span Due the End of the Burn Tank Being Reached Which Caused the LGF Pump to Surge	LGF Flow	Span	Switched Burn Tanks and Re-established LGF Fuel Flow
4/9/2013	4:03:30	4/9/2013	4:04:08	0:00:38	76	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow



NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
03/07/13 - 04/09/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/7/2013	6:04:08	3/7/2013	6:08:42	0:04:34	52	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span Due to Plugged Recirculation Flow Baskets	Scrubber Recirc. Rate	Span	Cleaned Scrubber Recirculation Baskets
3/9/2013	5:34:31	3/9/2013	5:38:25	0:03:54	53	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
3/10/2013	8:45:05	3/10/2013	11:53:50	3:08:45	54	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Rinsed Mist Pad	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/12/2013	16:03:40	3/12/2013	18:25:47	2:22:07	55	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to the ID Fan Failing. When the ID Failed, the Sudden Stop Sent Water Droplets Up the Stack Which Made Contact With the Stack Gas Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/13/2013	9:06:25	3/13/2013	11:37:31	2:31:06	56	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Rinsed Mist Pad	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
3/14/2013	3:29:03	3/14/2013	3:29:40	0:00:37	57	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
3/14/2013	20:55:54	3/14/2013	20:56:21	0:00:27	58	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
3/14/2013	21:53:07	3/14/2013	21:53:30	0:00:23	59	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
3/21/2013	18:48:26	3/21/2013	18:49:58	0:01:32	60	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
3/27/2013	4:04:09	3/27/2013	4:04:42	0:00:33	61	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure



NORLITE, LLC
MACT EXCEEDANCE REPORT - KILN 2
03/07/13 - 04/09/13

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/27/2013	4:04:48	3/27/2013	4:05:58	0:01:10	62	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
3/27/2013	4:08:24	3/27/2013	4:08:49	0:00:25	63	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Simultaneous Front and Back Chamber Pressure	Opl	Adjusted Fuel Flow and LGF Line Pressure
3/27/2013	4:08:56	3/27/2013	4:20:09	0:11:13	64	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System/Removing Aggregate Balls From the Cooler	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
3/30/2013	12:42:09	3/30/2013	14:51:28	2:09:19	65	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Rinsed Mist Pad	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
4/9/2013	23:56:22	4/9/2013	23:57:04	0:00:42	66	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow